

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011  
N2011-1

Docket No.

**RESPONSE OF PUBLIC REPRESENTATIVE WITNESS KLINGENBERG TO UNITED  
STATES POSTAL SERVICE INTERROGATORIES USPS/PR-T2-1-3**  
(October 4, 2011)

The Public Representative hereby provides responses of witness Klingenberg to the above-listed interrogatories of the United States Postal Service dated October 3, 2011. The interrogatories are stated verbatim and followed by the response.

Respectfully Submitted,

/s/ Tracy N. Ferguson  
Tracy N. Ferguson  
Public Representative

901 New York Avenue, N.W.  
Washington, D.C. 20268-0001  
(202) 789-6844; Fax (202) 789-6891  
[Tracy.Ferguson@prc.gov](mailto:Tracy.Ferguson@prc.gov)

**USPS/PR-T2-1.** Please provide a version of your testimony that comports with the Commission's filing requirements, specifically including line numbers on each page.

**Response:** As stated in the errata, a non-finalized version of the testimony was inadvertently filed. I apologize for the unfortunate oversight.

**USPS/PR-T2-2.** Your testimony references two library references upon which it relies, PR-LR-3 and PR-LR-NP1 (PR-T-2 at 2). Please describe each, explaining what it contains, how you use it and when the latter will be (or was) filed.

**Response:** As stated in the errata, a non-finalized version of the testimony was inadvertently filed. I apologize for the unfortunate oversight. I intended to file a public version of my library reference that removed all non-public data. Unfortunately, due to the requirement of facility identification, this task was not possible.

**USPS/PR-T2-3.** Please explain all of the analytical steps you took, from input data sources, assumptions, data limitations, all processing steps, output data, as the Commission's Rule 31(k) (39 C.F.R. § 3001.31(k)) requires. This documentation should include all data upon which you rely, including data obtained from ESRI, so that your analyses can readily be replicated. Please document each of your tables plus separate results reported in the text.

a. Did you attempt alternative analyses that you ultimately chose not to include in your testimony? If not, why not? If so, please provide a general description of what those efforts attempted to do and why they were ultimately abandoned.

**Response:** As stated in the PR-T-2 and the "PR-LR-NP2 Preface," I relied upon multiple USPS NonPublic Library References and census data obtained from ESRI (see line page 3 line 4 and page 12 lines 5-6 of PR-T-2). All of the tables contained in my testimony are included in PR-LR-NP2. Furthermore, all of my files are linked, and where SAS was used the SAS code has been provided. If any party, including the Postal Service, has difficulty replicating my analysis, I would be happy to hold a technical conference to explain the calculations.

a) I attempted many analyses that were not ultimately included in my testimony as the required data was not available, unfortunately.